

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,

Plaintiff,

v.

**HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC, HYUNDAI
ENGINEERING AMERICA, INC. and
DYNAMIC SECURITY, INC.**

Defendants.

**CIVIL ACTION NUMBER:
2:19-cv-00767-ECM-SMD**

**MOTION OF HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC, FOR LEAVE
TO AMEND EXHIBIT LIST**

Defendant Hyundai Motor Manufacturing Alabama, LLC (“HMMA”), Defendant in the above-styled matter, moves this Court for leave to amend its exhibit list to include one additional entry. In support of this motion, HMMA shows as follows:

1. HMMA requests to add HEA’s invoices to HMMA for July 2017 and August 2017, produced as HEA0219-HEA0230. These were produced by HEA in May 2022, and were used by Plaintiff in the depositions of Robert Burns as Plaintiff’s Exhibit 24 (HEA0219-224) and 25 (HEA0225-230) and Kristal Riddle as Plaintiff’s Exhibit 24 (HEA0219-224).

2. Plaintiff has listed the invoice for July 2017 (HEA0219-0224) as a “may offer” exhibit (#34). All parties have included in their exhibit lists the incorporation of exhibits listed by other parties not excluded by ruling.

3. The August 2017 invoice is not substantially different in format or any other relevant respect, in HMMA’s counsel’s opinion, from the July 2017 invoice. The August 2017 invoice would simply confirm that the invoicing between defendants was consistent throughout

the time relevant to Plaintiff's complaint (for purposes of invoicing, this would be, at most, July 19, 2017-August 1, 2017).

4. Accordingly, there is no prejudice to any party from the addition of these items on HMMA's exhibit list.

5. HMMA emailed counsel in this case regarding this motion at 4:00pm on January 31, 2023, requesting feedback. Defendants HEA and Dynamic Security, Inc., do not oppose. Counsel for HMMA has not received a response from Plaintiff's counsel.

Respectfully Submitted,

s/ Whitney R. Brown
David J. Middlebrooks ASB- 8553-D58D
Whitney R. Brown ASB-4431-H71B

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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